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CH2MHILL

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CH2M HILL

Tel 510.251.2426

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April 13, 2009

277085.31.LC/XC2006217A

Mr. Henry Chui California Environmental Protection Agency Department of Toxic Substances Control 700 Heinz Avenue, Suite 200 Berkeley, CA 94710-2737

Subject: Polychlorinated Biphenyls at Building 688 UL#02 In Investigation Area C2, Where

No Further Action is Required under the Department of Toxic Substances Control

Consent Agreement

Dear Mr. Chui:

CH2M HILL prepared this letter in compliance with the requirements in the Consent Agreement for Lennar Mare Island, LLC's (LMI), Eastern Early Transfer Parcel (LMI et al. 2001) signed April 16, 2001, by LMI, the City of Vallejo, and the California Environmental Protection Agency, Department of Toxic Substances Control (DTSC) and according to the *Final Polychlorinated Biphenyl Work Plan* (CH2M HILL 2003). The letter requests DTSC concurrence that a no further action (NFA) determination is appropriate, with respect to polychlorinated biphenyl (PCB) contamination, as part of the overall regulatory closure process for the PCB Site Building 688 UL#02, on LMI's Eastern Early Transfer Parcel. An NFA determination is appropriate because a site-specific risk evaluation, presented in this letter, demonstrates that the potential risks associated with exposure to residual PCBs at PCB Site Building 688 UL#02 are at the low end of the risk-management range and the hazard index for the industrial worker is less than 1. The results of the investigations show that no cleanup activities are necessary at PCB Site Building 688 UL#02.

Site Identification

Using visual site surveys, reviews of historical records, building closure reports, and databases of electrical equipment, the United States Department of the Navy (Navy) identified sites where PCB-containing equipment was located, PCB spills were documented, or contamination was suspected because of building history or visible stains (Tetra Tech Environmental Management, Inc. [TtEMI] 1999). Navy personnel from Supervisor of Shipbuilding, Conversion and Repair, Portsmouth, Virginia, Environmental Detachment (SSPORTS) conducted interim PCB assessments and performed cleanup actions (e.g., washing, scabbling) in accordance with technical work documents (TWDs), where necessary.

Building 688, a pump test shop built in 1941, is located east of Railroad Avenue and south of Oklahoma (formerly 13th) Street in Investigation Area C2 (Figure 1). Building 688 is currently occupied and used for material storage. According to the *Preliminary Land Use Plan*

(SWA Group 2000), Building 688 is in an area designated for future industrial use. Figure 1 shows the location of Building 688.

There are three previously-unidentified PCB sites associated with Building 688 that were not listed in the Consent Agreement signed April 16, 2001 between LMI, the City of Vallejo, and the State of California Environmental Protection Agency, Department of Toxic Substances Control (DTSC) (LMI et al. 2001): UL#01, UL#02, and UL#03. PCB Site Building 688 UL#02 is defined as the building floor stains in the northern, southeastern, and central interior of Building 688. PCB Site Building 688 UL#01 consists of concrete, manholes, soil, and asphalt associated with a transformer pad adjacent to the western exterior wall of Building 688 and is being addressed for closure in a separate submittal. PCB Site UL#03 consists of loose sediment and debris inside covered and steel-lined pits beneath the floor of Building 688 and is being addressed for closure in a separate submittal (Figure 1).

Site Investigations and Cleanup Actions

Table 1 summarizes the previous sampling at Building 688 UL#02. This table includes the sample numbers, matrices, dates, and total PCB concentrations (or laboratory reporting limit if PCBs were not detected).

The following site investigation summary is based on CH2M HILL's review and interpretation of historical information contained in TWDs 95-0328 and 95-0340, which were discovered during transition of Navy documents to LMI prior to commencement of work under the Consent Agreement. From this historical documentation, it appears that in April 1995, SSPORTS performed PCB sampling activities inside Building 688. A hand-annotated, undated figure attached to the TWDs (Attachment 1) appears to show approximately 40 proposed sample locations on the first floor of Building 688; however, there is only documented evidence of four samples being collected based on the laboratory data sheets and proposed actions at two targeted locations presented in the TWDs. The laboratory data sheets for the four samples collected by SSPORTS (5103-0644, -0645, -0667, and -0668) are summarized in Table 1 and are provided with the TWDs for reference in Attachment 1. The approximate location of two of the four samples collected by SSPORTS whose PCB concentrations were 4.09 micrograms per sample area (µg/sample) (5103-0667) and $2.45 \mu g/sample$ (5103-0645) were not specifically identified in the TWDs, but their approximate location inside Building 688 has been plotted in Figure 2 using the locations on the hand-annotated figure in TWD 95-0328 (SSPORTS 1995a-b). The location of the remaining two wipe samples was determined from the TWDs. Wipe sample 5103-0668 (15.1 μg/sample) was collected from a stained area in the southwestern part of Building 688, and wipe sample 5103-0644 (11.2 µg/sample) was collected from the stain in the northern part of Building 688 (SSPORTS 1995 a-b) (Figure 2).

As part of TWD 95-0328, SSPORTS decontaminated the stain in the northern part of Building 688 where previous wipe sample location 5103-0644 (11.2 μ g/sample) was collected (SSPORTS 1995b) (Figure 2). The floor stain was double-washed/-rinsed with industrial-strength detergent or non-ionic surfactant solution (Attachment 1). Additionally, as part of TWD 95-0340, SSPORTS decontaminated a stain in the southeast end of Building 688 where previous wipe sample location 5103-0668 (15.1 μ g/sample) was collected (SSPORTS 1995a) (Figure 2). The floor stain was double-washed/-rinsed with industrial-strength detergent or non-ionic surfactant solution (Attachment 1).

Based on historical laboratory data sheets, in 1996, SSPORTS collected one concrete chip sample (6120-0018) from a stain in the northern part of the building (1.6 milligrams per kilogram [mg/kg]), one oil sample (6120-0019) from a starting compensator (3.9 parts per million) that was located in the southern portion of the building at that time, and one additional concrete sample (6120-0017) from an unknown location (1.5 mg/kg). Based on visual observations from inside the building, it is believed that the starting compensator from Building 688 was removed prior to CH2M HILL's involvement at the site.

On June 28, 2002, CH2M HILL collected one wipe verification sample (B688UL2WP0273) from the northern stain and one concrete chip verification sample (B688UL2CH0274) from the southeastern stain (Figure 2). PCBs were detected in wipe sample B688UL2WP0273 at a total concentration of 1.32 micrograms per 100 square centimeters (μ g/100 cm²) and in concrete chip sample B688UL2CH0274 at a total concentration of 0.42 mg/kg (Figure 2).

Polychlorinated Biphenyl Site Closure Process

According to the *Final Polychlorinated Biphenyl Work Plan* (CH2M HILL 2003), and under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), NFA is appropriate at a PCB site if no potential source and no PCB contamination are present. Even if a potential source or PCB contamination is present in machinery or building materials, NFA is appropriate under CERCLA if there has been no release of PCBs to soil or groundwater and no visible pathway exists for migration of PCBs to soil or groundwater. If there has been a known release to soil or groundwater, NFA is also appropriate if the detected PCB concentrations in soil and groundwater do not exceed the applicable screening levels, or if results of a site-specific risk evaluation demonstrate that potential risks associated with exposure to residual PCBs are within the risk-management range generally used to determine whether cleanup is necessary.

Following the cleanup action at PCB Site Building 688 UL#02, the maximum remaining total PCB concentration in a concrete sample is 1.6 mg/kg. The exposure point concentration (EPC) for total PCBs in concrete, using the 95 percent upper confidence limit on the mean generated using proUCL 4.0, is 1.6 mg/kg (maximum value). As a screening-level assessment of potential cancer risks and noncancer hazards associated with exposure to residual levels of PCBs in floor materials, the risk ratio approach was used to calculate cancer risk and hazard index estimates that are based on the United States Environmental Protection Agency's (USEPA's) regional screening levels (RSLs) and the EPC. Using the EPC, the estimated potential risk from exposure to solids in an industrial setting at PCB Site Building 688 UL#02 is 1.8×10^{-6} (EPC for total PCBs [1.6 mg/kg] divided by the USEPA RSL for cancer effects [0.86 mg/kg] x 10-6), and the hazard index is less than 1 (EPC for total PCBs [1.6 mg/kg] divided by the USEPA RSL for noncancer effects for the industrial worker [11 mg/kg] = 0.15).

The total cumulative potential risk from exposure to PCBs in the building materials (wood, asphalt, and concrete) at PCB Site Building 688 UL#02 is 2 x 10-6. This is likely an overestimate of potential risks because the RSL that was used in the risk calculation for solid media is based on soil exposure and includes the inhalation, dermal contact, and ingestion exposure routes and an exposure frequency of 250 days per year. In addition, for each of the exposure routes, the exposure assumptions for intake of PCBs in soil probably overestimate intake of PCBs in the floor.

According to the risk evaluation results, and because conservative assumptions were used in the risk calculations for this site, no further PCB cleanup is necessary at PCB Site Building 688 UL#02. Therefore, the conditions for DTSC closure of PCB sites have been met for this site. An NFA determination under CERCLA would be protective of human health and the environment at PCB Site Building 688 UL#02, with implementation of a land use covenant limiting the property to industrial use.

Conclusions

The estimated potential cumulative risk for PCBs in building materials (concrete floor) in an industrial setting at PCB Site Building 688 UL#02 is 2 x 10-6, and the hazard index (industrial worker scenario) is less than 1. The results of the site-specific risk evaluation completed for PCB Site Building 688 UL#02 demonstrate that potential risks associated with exposure to residual PCBs at PCB Site Building 688 UL#02 are at the lower end of the risk-management range generally used to determine whether cleanup is necessary (1 x 10-4 to 1 x 10-6). Therefore, in accordance with the *Final Polychlorinated Biphenyl Work Plan* (CH2M HILL 2003), NFA is appropriate for PCB Site Building 688 UL#02. Consequently, it is requested that DTSC issue an NFA determination under CERCLA, with implementation of a land use covenant limiting PCB Site Building 688 UL#02 to industrial use. This land use covenant will run with the land, and will be enforceable by the DTSC, with USEPA as a third-party beneficiary.

Please respond to this letter with confirmation that, in accordance with the approved *Final Polychlorinated Biphenyl Work Plan* (CH2M HILL 2003), NFA under CERCLA is appropriate for PCB Site Building 688 UL#02. Please submit your response to Stephen Farley at the above address or via email at Stephen Farley at 197. If you have questions regarding the PCB site addressed in this letter, please contact Jennifer Lindquist at 530/229-3224 or Stephen Farley at 707/562-1015, extension 103.

Sincerely,

CH2M HILL

Jennifer L. Lindquist Project Manager

(B688UL#02_DTSC.doc)

Enclosures: Table 1, Figure 1, and Figure 2

Stephen M. Farley, P.G. Quality Control Manager

References

CH2M HILL. 2003. Final Polychlorinated Biphenyl Work Plan. March 7.

- Lennar Mare Island, LLC (LMI), the City of Vallejo, and the State of California
 Environmental Protection Agency, Department of Toxic Substances Control (DTSC).
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 Control. April 16.
- Supervisor of Shipbuilding, Conversion, and Repair, Portsmouth, Virginia, Environmental Detachment (SSPORTS). 1995a. PCB Decontamination Technical Work Document (TWD) No. 95-0340. June.
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- Tetra Tech Environmental Management, Inc. (TtEMI). 1999. Final Basewide Polychlorinated Biphenyl Confirmation Sampling Summary Report. Revised. January.
- United States Environmental Protection Agency (USEPA). 2008. Regional Screening Levels for Chemical Contaminants at Superfund Sites.

 http://epa-prgs.ornl.gov/chemicals/index.shtml. September.

Copy to (with enclosures):

Mr. Paisha Jorgensen Regional Water Quality Control Board 1515 Clay Street, Suite 1400 Oakland, CA 94612 (Non-PCB documents only; Also electronic copy of non-PCB documents)

Mr. Gordon Hart Paul, Hastings, Janofsky, Walker, LLP 55 Second Street, 24th Floor San Francisco, CA 94105-3411

Ms. Carolyn d'Almeida U.S. EPA Region 9 (SFD 8-1) 75 Hawthorne Street, 9th Floor San Francisco, CA 94105

Mare Island Conversion Division City of Vallejo, 555 Santa Clara Street Vallejo, CA 94590-5934 (Electronic copy only)

Mr. Neal Siler Lennar Mare Island, LLC 690 Walnut Avenue, Suite 100 Vallejo, CA 94592 (Electronic copy also)

Ms. Myrna Hayes 816 Branciforte Street Vallejo, CA 94590

Mr. Gil Hollingsworth

Mr. Bob Palmer Caretaker Site Office, SF Bay 410 Palm Ave., Bldg. 1, Suite 161 San Francisco, CA 94130 (2 copies)

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Mr. John Catts 130 Camino Margarita Nicasio, CA 94946 (Electronic copy only)

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Paula Bolio Clemena Balbuena **Jen Tausch** Tim Graves (Electronic copy only) Ed Aromi (Electronic copy only) Starr Dehn (Final link only) John Romie (Electronic copy of final only)

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Ms. Janet Whitlock U.S. Fish and Wildlife Service 2800 Cottage Way, Room W-2605 Sacramento, CA 95825 Mr. Justice Budu 107 Fieldstone Way Vallejo, CA 94589

Ms. Laurie Sullivan
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Administration
75 Hawthorne Street, 9th Floor
San Francisco, CA 94105
(Electronic copy only via email)

Mr. Mike Coffey 6 Oricle Court American Canyon, CA 94503

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Mr. Kenneth Browne 109 El Camino Real Vallejo, CA 94590 Mr. Max Delaney San Francisco Bay Commission 50 California Street, Suite 2600 San Francisco, CA 94102

Mr. Adam A. Chavez 1031 Florida Street Vallejo, CA 94590-5513

Mr. Terry Schmidtbauer Dept. of Resource Management County of Solano 675 Texas Street, Suite 5500 Fairfield, CA 94533

Mr. Gerald Karr 149 Garden Court Vallejo, CA 94591

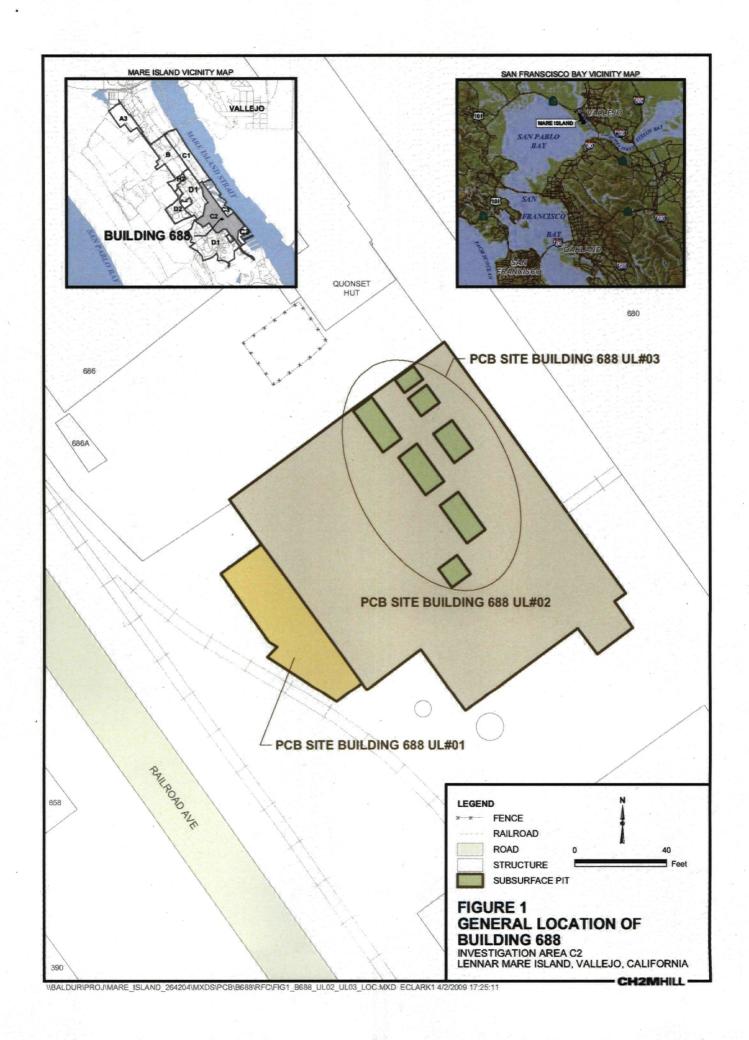
Mr. Russell S. Sherman Vallejo Fire Department 970 Nimitz Avenue Vallejo, CA 94592

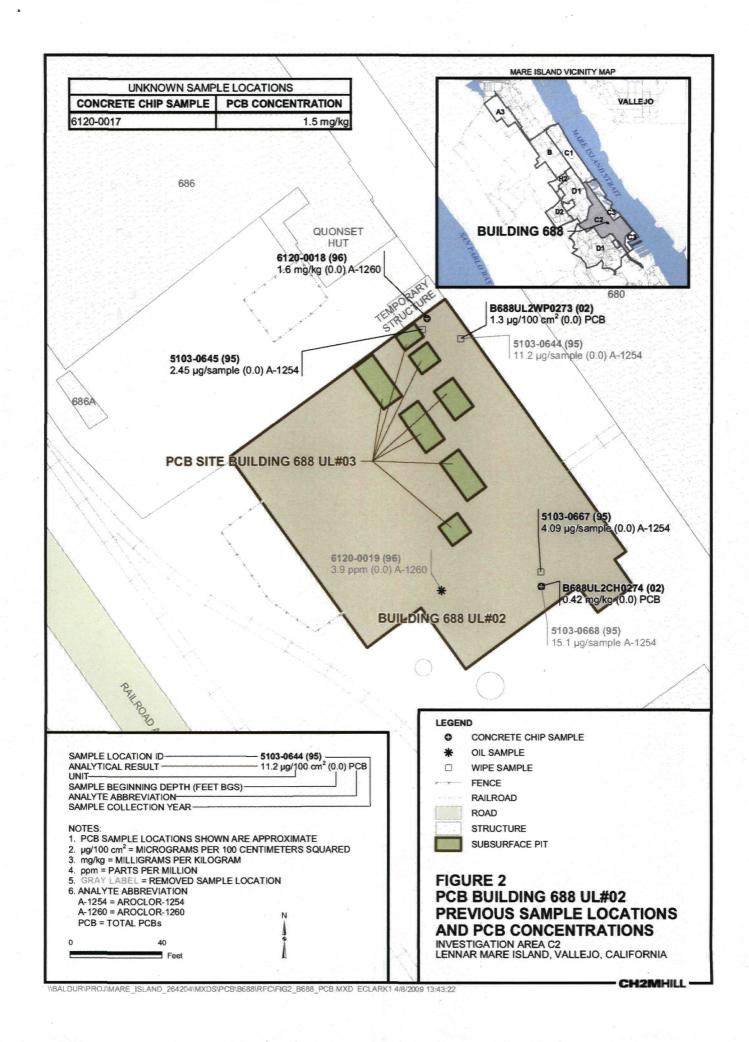
Ms. Paula Tygielski 456 East L Street Benicia, CA 94510

TABLE 1 Sample Results for Building 688 UL#02 PCB Sites, Lennar Mare Island, Vallejo, California

PCB Site Name	Site Description	Sample Number	Sample Matrix	Sample Date	Total PCB Concentration	Comments
Building 688 UL#02	Interior of Building 688	5103-0644	Concrete wipe	04/14/1995	11.2 μg/sample	Stain in northern portion of building; removed per TWD 95-0328; Aroclor-1254
		5103-0645	Concrete wipe	04/14/1995	2.45 μg/sample	Collected from southern portion of building; Aroclor-1254
		5103-0667	Concrete wipe	04/17/1995	4.09 μg/sample	Collected from southern portion of building; Aroclor-1254
	·	5103-0668	Concrete wipe	04/17/1995	15.1 μg/sample	Stain in southeastern portion of building' removed per TWD 95-0340; Aroclor-1254
•		6120-0017	Concrete chip	04/1996	1.5 mg/kg	Unknown location inside Building 688; Aroclor-1260
•		6120-0018	Concrete chip	04/30/1996	1.6 mg/kg	Stain in northern portion of building; Aroclor-1260
		6120-0019	Oil	04/1996	3.9 ppm	Oil sample from starting compensator (removed); Arodor-1260
		B688UL2WP0273	Concrete wipe	06/28/2002	1.32 μg/100 cm ²	Verification sample associated with cleanup of 5103-0644;
		B688UL2CH0274	Concrete chip .	06/28/2002	0.42 mg/kg	Verification sample associated with cleanup of 5103-0668;

mg/kg milligrams per kilogram
μg/100 cm² micrograms per 100 square centimeters
ND not detected (laboratory reporting limit)
ppm parts per million
PCB polychlorinated biphenyl





Attachment 1

MARE ISLAND NAVAL SHIPYARD YARD ROUTE SLIP

ರ್ಷಾ 106.4PCI	3 B52		TABLE KISH ESTGOTS THORAS
ACTION	!		COORDINATE THE PREPARE ORAFT THE RETENTION
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70	INITI	ALED	SUBJECT
CODE	ВУ	DATE	TWD# <u>SOR</u> BLDG# <u>688</u>
			COMMENTS
106,4	100	6/15	REVIEW / A.
106 4FP -	74/2	9/15	APPROVAL
-106.1			-CONCURRENCE (WHEN REQUIRED)
1 06.2			-GONGURRENGE-(WHEN-REQUIRED)-
106.32	weeff.	5/15/45	CONCURRENCE
,			ITEM#_107/A ON 106.04 SURVEY REPORT
			COPIES TO 300CC/EC, STATUS
106.4		6-16-95	LAST: LINDA REMMINGTON (COPIES TO 300EC/CC &=106;1/406;2)
		·	LARRY RAMEY
			CRAIG VARNAU
			MINS 5216/24 (REV 1-65)



PCB DECONTAMINATION TECHNICAL WORK DOCUMENT (TWD)

PCB	CONTAMINATED	MACHINE	NO FL	LOOR	STAIN-	-88

TWD NO. 95-0328

BLDG NO. 688

MARE ISLAND NAVAL SHIPYARD VALLEJO, CALIFORNIA

Prepared by:	Distribution:	300EC
BRAC Environmental Technical Division		300CC
Code 106.4		106.4
Vallejo, Calif. 94592		106.32

PCB DECONTAMINATION TECHNICAL WORK DOCUMENT

INITIAL ISSUE

	C 11 1 1 1	Date
Prepared by:	1 A secret to the transfer of	14116 000
Reviewed by:	Code 198.4	6-15-95
Approved by:	Code 106.4 ()	5/15/48
Concurrence:	Code 105.4 (Project Manager)	5-15-95
	Code 106,32	

Rev.	Description	Approval	Date
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1.0 Purpose

1.1 The purpose of this TWD is to decontaminate stained concrete floor area of building 688, (1st floor). The stain is located in the northeast side of building 688 (see sketch on enclosure 3). The stain contains 11.2 ug/100 sq. cm. for sample 5103-0644. The result exceeds the acceptable PCB level of 10 ug/100 sq. cm. (see enclosure 1) as described in reference 3.2. The sample number should be marked near the sample location. Code 106.4 shall be contacted at 6-7657 if sample number is missing from the area.

2.0 Description

2.1 The floor oil stain shall be decontaminated using the procedures required by this TWD.

3.0 References

- 3.1 NAVSHIPYDMAREINST 5100.36 -- Shipyard Occupational Safety and Health Workplace Manual, Mare Island Naval Shipyard, Occupational Safety, Health, and Environmental Office -- Code 106
- 3.2 Workplan PCB Decontamination for Spill Sites, Mare Island Naval Shipyard, Code 106.4.
- 3.3 Mare Island Naval Shipyard Environmental Protection Manual of 1 February 1994

4.0 Health & Safety Section / General Notes

4.1 All work performed shall be in strict adherence to the shipyard Occupational Safety and Health (OSH) Manual (reference 3.1) the General Health & Safety Plan, Section 4 of reference 3.2., and the Health and Safety Section of this TWD.

- 4.2 At least two people shall be present at all times while chemical or physical hazards exist and access is being controlled to the PCB Work Area.
- 4.3 Personal protective equipment (PPE) shall be as follows:

Saranex coated tyvek coveralis

Viton gloves with latex gloves worn over them.

Steel toed boots (if worn without coverings shall be washed with detergent and rinsed).

Nitrile or neoprene foot coverings may be worn over steel toed boots,

Face shield (8" minimum) with vented goggles (while cleaning)

4.4 Workers performing decontamination shall have received the following training as a minimum:

PCB Handling Controls (course YJ-B010)

Hazcomm (course YJ-A552)

- 4.5 The main hazard at the site is PCBs on the floor. Slip and trip hazards are existent due to raised floor from water damage. Ventilation is adequate as the building is vacant and is large, and this will provide fresh air.
- **4.6** Temperatures above 100 degrees are not expected, nor is any hot work authorized, so PCBs will not be airborne.
- 4.7 Site access shall be controlled using the following areas:
 - Hot Zone The area of the spill site. Personnel entry to the hot zone shall be minimized. The area to be decontaminated and disposed of is the hot zone plus the buffer zone.
 - •Buffer Zone A one (1) foot wide area adjacent to and surrounding the hot zone.
 •Warm Zone An area approximately three (3) feet by six (6) feet near the hot zone established by this TWD. The warm zone shall be used for exiting PPE decontamination procedures. The warm zone shall be established prior to beginning decontamination.

These areas shall be posted to exclude unauthorized personnel and the building shall be locked when not in use.

- 4.8 An emergency eyewash station with a 15 minute minimum capacity shall be accessible in 10 seconds or less from the work area.
- 4.9 Phone numbers are as follows:

Hospital; 9-911 or 646-4444

Ambulance: 9-911 or 646-4444

Spill team:

646-0182 or 0183

Fire: 9-911 or 646-3333

Police: 9-911 or 646-2222

F

Project Mgr.: 646-5945

Emergency: 9-911

4.10 Contact Code 106.4, L. Ramey at 6-7657 immediately after the floor decontamination. Resampling after decontamination is required by Code 106.4.

5.0 Decontamination Procedures

5.1 Support Area (Personal Decontamination)

Personal decontamination is required for PPE and cleaning equipment that comes in contact with PCB contaminated surfaces or PCB contaminated cleaning fluid and materials: Personal decontamination shall be performed in the warm zone, as defined in Section 4.7, and shall be performed in accordance with Section 4.9 of reference 3.2. The floor of the warm zone and routes between the warm zone and the hot zones shall be covered with plastic drop cloths to avoid spread of contamination.

5.2	14	9	PF	'n	rn	۱۹
J. C.	- 11		г в	v		1.3

Code 106.4 will provide minimum specific health and safety information in Section 4.0 of each TWD. This information in most cases will be sufficient. Personal preferences regarding PPE)and communication methods, and changes at the decontamination site from the time the TWD was written to when the decontamination is accomplished/completed may cause a change to the health and safety information provided. Therefore, the On-Site Health and Safety Coordinator, just prior to and during decontamination, shall review HSP forms 4.6, 4.15 and 4.16 of reference 3.2 and complete forms if: 1) one of the conditions mentioned in the previous sentence exist or 2) the TWD does not cover an item, e.g. communications, on HSP form 4.16. Any down grading of health and safety information (PPE and air monitoring) will only occur upon written approval of Code 106.4. HSP Acceptance Form 4.17 (enclosure 2), must be completed and signed by each person performing decontamination.

Sampling Evolution (Place an x or number on applicable line)

i	Initial Sampling X Resampling (1,2,3,etc.)
5.4	Specific Instructions:
	Perform decontamination of floor stain in accordance with the applicable general
	instructions set forth in reference 3.2, section 2, paragraph 2.5.1, and the specific
	requirements as follows: Before starting decon move work bench out of the way.
	Double wash frinse entire stain on concrete area with industrial strength detergent
	or non-ionic surfactant solution, following steps in paragraph 2.5.2.1 All waste
	(including rags, gloves, etc.) shall be packaged and handled as PCB
	contaminated waste. Properly contain, store, label and dispose of contaminated
	debris, absorbents, rags, and other materials resulting from the decontamination.
	Latest disposal requirements are in reference 3.3 (Chapter 9, 4.c.(1).
5.5	Other Instructions
	Resampling is required (see paragraph 4.10). Code 106 4 shall take a solid
	sample of the concrete area.
5.6	The shop performing the decontamination shall sign below to certify that the
	decontamination conforms to this TWD.
5.6.1	Code 300EC performed decontamination of floor oil stains in building 688 as
	required.
	Code 300EC Date
	Return completed information package (TWD and HSP forms) for this floor stain
	to the project engineer, Code 106.4 PCBs, Building 521, second floor.
6.0	Code 106.4 Engineering Review and Approval and Resampling Results
	eptance
6.1	Code 106.4 conduct review and approval of information package. Floor oil stain decontamination conforms with requirements of this TWD.
	Code 106.4
	. 3

6.2	Code 106.4 review and acceptance of resampling results. For results to be satisfactory they must be \leq 10 µg/100 sq. cm, for wipe samples and < 50 ppm for other samples where no release to the environment has occurred.				
	Results'are: Li SAT	UNSAT (remarks required)			
	Remarks:	THE PARTY WAS ASSESSED.			
	and the second s	TTT 1 11 7 1 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4			
•	Code 106.4	Date			
7.0	Enclosures	•			
	(1) Sample Results				
	(2) Health And Safety Plan Accept(3) Sketch	ance Form			



ANALYTICAL REPORT

Wiles - Stine Mayal Chippend	Cale Spage of	04/14/56
Coda 106-14, Step 7-56	Date Gun Synd	Parkust
Building 1345	Date Extracted	047.0795
Vallejo, CA - 04 592 -5100	Date Analyzea	05/17/95
	Work Onter No	95-04-516
Atte: Tarreni Kratzet	filestic and	FPA 8020 (PC lis)
Ist: Contract No. NO5123-92-0-4010	Jago 12 6 i 20	

All results are reported in jig/sample.

Sample Number: 5897-95 (688/05-F2/floor oil stain #) たがっと ひょっぱげ

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Sample Number: 5898-9	5 (688/05-F2/floor oil stain #)	
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ENCLOSURE

-835 A 1995

Health And Safety Plan Acceptance Form

at the PCB wo	rk area. Altach the completed forms to the TWD.
TWD No::	95-0328
PCBCM#:	FLOOR STAIN 68
,	ſ
By my signatur	re below, I acknowledge that I have read and understand the contents of
the Health & S	afety Plan for this project. If agree to perform my work in accordance
with the Health	and Safety Plan.
Signatu	ire
Print N	ame
Code	
Date	
By my signatu	re below, I acknowledge that I have read and understand the contents of
	afety Plan for this project. Lagree to perform my work in accordance
with the Health	n and Safety Plan.
Signali	ıre
Print N	ame
Code	
Date	

INSTRUCTIONS: This form is to be completed by each person prior to beginning work

Enclosure 2

663

FLOOR STAIN GORTH
SAMPLE NO 5103-0644
(RED FAINT)

MARE ISSAND HIDG 688 ENCLOSURE (1). SHEET 7 OF 8

ENCLOSURE 3

Fing ar nond

7

MARE ISLAND NAVAL SHIPYARD YARD ROUTE SLIP

106.4PC	CB STOP	BAME	L. RAMEY 6-7657
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ANALYTICAL REPORT

Marc Island Naval Shipyard	Date Sampled	16014,65
Code 106, 14, Stop T-56	Oate Received	04/25/95
Building 1345	Date Extracted.	04/26/951
Vallejo, CA 94592-5100	Date Analyzed:	05/13/95
	Work Order No.	95-04-518
Attn: Tammi Kratzel	Method.	EPA 8080 (PCBs)
RE: Contract No. N00123-92-D-4011	Page 12 of 20	

All results are reported in Fig/sample.

Sample Number: 5897-95 (688/05-F2/floor oil stain #) 上口ローファーデ

Aŭalyta	Coccentration	Repolitable Limit
Arocior 1016	NO	0.1
Aroclor-1221	ND ND	*
Aroclor-1232	NO	0.1
Araclar-1242	NO	0.1
Aroclor-1248	ND	. 0 1
Arector-1254	11.2	Ç.1
Aroclor-1260	NO	0.1
Arodor-1282	MD	
Sample Number: 5898	-95 (688/05-F2/floor oil stain #)	
Aradlar-1016	ND	0.1
Arodor-1221	ND	0.1
Araciar-1232	ND	1
Arocloi-1242	NO	. (1.1
Arodor 1246	MD	0.1
Arcclor-1254	2,45	G. 1
Aroclor-1260	CH3	0.1
Arocler-1262	ND	O . 1

MMM. 1150, 2000 - 11

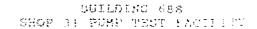
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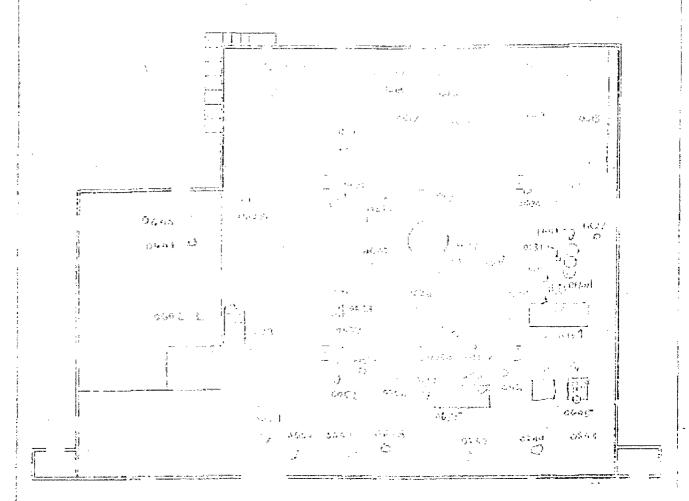
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5901-15	5103-0648	688/05-#2/ficon oil	5131ក គ		04/14/95	14:21	::	[]	{∀}	121	; ;;	; 40nt;	300125	
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MARE ISLAND BLDG 688 ENCLOSURE (1) SHEET 7 OF 8

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MARE ISLAND NAVAL SHIPYARD YARD ROUTE SLIP

106.4PC	B 816# B52	1. D	OUS WOOTEN	6765 S	6-16-95
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PCB DECONTAMINATION TECHNICAL WORK DOCUMENT (TWD)

PCB	CONTAMINATED	MACHINE NO	D FLOOR STAIN-	88
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TWD NO. ____ 95-0340

BLDG NO. _____688

MARE ISLAND NAVAL SHIPYARD VALLEJO, CALIFORNIA

Prepared by:
BRAC Environmental Technical Division
Code 106.4
Vallein Calif 94592

Distribution:

COEC

300CC 106.4

120,4 46.35

06, 32

PCB DECONTAMINATION TECHNICAL WORK DOCUMENT

INITIAL ISSUE

		₽ a(€
Prepared by.	Dougla Wooten	0/16/05
	Code 106.4	
Reviewed by:	Alexander Toral	6-16-75
	Code 106:4	
Approved by:	Pefaire	8/15/25
	Code 106.4 (Project Manager)	
Concurrence:	Clayen fel for	6/17/25
•	Code 106.32	•

Rev.	Description	Approval	Date
	• •		i e

1.0 Purpose

1.1 The purpose of this TWD is to decontaminate stained area on the painted concrete area of building 688, (1st floor). The stain is located in the southeast end of building 688 (see sketch on enclosure 3). The stain contains 15.1 ug/100 sq. cm. for sample 5103-0668. The result exceeds the acceptable PCB level of 10 ug/100 sq. cm. (see enclosure 1) as described in reference 3.2. The sample number should be marked near the sample location. Code106.4,B.Turner shall be contacted at 6-2471 if sample number is missing from the area.

2.0 Description

2.1 The floor oil stain shall be decontaminated using the procedures required by this TWD.

3.0 References

- 3.1 NAVSHIPYDMAREINST 5100.36 Shipyard Occupational Safety and Health Workplace Manual, Mare Island Naval Shipyard, Occupational Safety, Health, and Environmental Office — Code 106
- Workplan PCB Decontamination for Spill Sites, Mare Island Naval Shipyard, Code 106 4
- 3.3 Mare Island Naval Shipyard Environmental Protection Manual of 1 February 1994

- 4.0 Health & Safety Section / General Notes
- 4.1 All work performed shall be in strict adherence to the shipyard Occupational Safety and Health (OSH) Manual (reference 3.1) the General Health & Safety Plan, Section 4 of reference 3.2., and the Health and Safety Section of this TWD.
- 4.2 At least two people shall be present at all times while chemical or physical hazards exist and access is being controlled to the PCB Work Area.
- 4.3 Personal protective equipment (PPE) shall be as follows:

Saranex coated tyvek coveralls

Viton gloves with latex gloves worn over them.

Steel toed boots (if worn without coverings shall be washed with detergent and

Nitrile or neoprene foot coverings may be worn over steel toed boots.

Face shield (8" minimum) with vented goggles (while cleaning)

4.4 Workers performing decontamination shall have received the following training as a minimum:

PCB Handling Controls (course YJ-B010)

Hazcomm (course YJ-A552)

- 4.5 The main hazard at the site is PCBs on the floor. Ventilation is adequate as the building is vacant and is large, and this will provide fresh air.
- 4.6 Temperatures above 100 degrees are not expected, nor is any hot work authorized, so PCBs will not be aircome.
- 4.7 Site access shall be controlled using the following areas:
 - Hot Zone The area of the spill site. Personnel entry to the hot zone shall be minimized. The area to be decontaminated is the hot zone plus the buffer zone.
 - Buffer Zone A one (1) fool wide area adjacent to and surrounding the hot zone.
 - •Warm Zone An area approximately three (3) feet by six (6) feet near the hot zone established by this TWD. The warm zone shall be used for exiting PPE decontamination procedures. The warm zone shall be established prior to beginning decontamination.

These areas shall be posted to exclude unauthorized personnel and the building shall be locked when not in use.

- 4.8 An emergency eyewash station with a 15 minute minimum capacity shall be accessible in 10 seconds or less from the work area.
- 4.9 Phone numbers are as follows:

Hospital: 9-911 or 646-4444

Ambulance: 9-911 or 646-4444 Fire:

9-911 or 646-3333

Spill team: Police:

646-0182 or 0183 9-911 or 646-2222

Project Mgr.: 646-5945

Emergency:

9-911

- 4.10 Contact Code 106.4, B. Turner at 6-2471 immediately after the floor decontamination. Resampling after decontamination is required by Code 106.4.
- 5.0 Decontamination Procedures

5.1 Support Area (Personal Decontamination)

Personal decontamination is required for PPE and cleaning equipment that comes in contact with PCB contaminated surfaces or PCB contaminated cleaning fluid and materials. Personal decontamination shall be performed in the warm zone, as defined in Section 4.7, and shall be performed in accordance with Section 4.9 of reference 3.2. The floor of the warm zone and routes between the warm zone

and the hot zones shall be covered with plastic drop cloths to avoid spread of contamination.

5.2 HSP Forms

Code 106.4 will provide minimum specific health and safety information in Section 4.0 of each TWD. This information in most cases will be sufficient. Personal preferences regarding PPE and communication methods, and changes at the decontamination site from the time the TWD was written to when the decontamination is accomplished/completed may cause a change to the health and safety information provided. Therefore, the On-Site Health and Safety Coordinator, just prior to and during decontamination, shall review HSP forms 4.6, 4.15 and 4.16 of reference 3.2 and complete forms if: 1) one of the conditions mentioned in the previous sentence exist or 2) the TWD does not cover an item, e.g. communications; on HSP form 4.16. Any down grading of health and safety information (PPE and air monitoring) will only occur upon written approval of Code 106.4. HSP Acceptance Form 4.17 (enclosure 2), must be completed and signed by each person performing decontamination.

•••	Initial Sampling X Resampling (1,2,3,etc.)
5.4	Specific Instructions: Perform decontamination of floor stain in accordance with the applicable general instructions set forth in reference 3.2, section 2, paragraph 2.5.1, and the specific requirements as follows:. Double wash / rinse entire stain on concrete area with industrial strength detergent or non-ionic surfactant solution, following steps in paragraph 2.5.2.1. All waste shall be packaged and handled as PCB contaminated waste. Properly contain, store, label and dispose of contaminated debris, absorbents, rags, and other materials resulting from the decontamination. Latest disposal requirements are in reference 3.3 (Chapter 9, 4.c.(1).
5.5	Other Instructions Resampling is required (see paragraph 4.10) Code 106.4 shall take a swipe sample of the concrete area
5.6 5.6.1	The shop performing the decontamination shall sign below to certify that the decontamination conforms to this TWD. Code 300EC performed decontamination of floor oil stains in building 688 as
	required. ; ; ; ; ; ; ; ; ; ; ; ; ; ; ; ; ; ; ;
	Return completed information package (TWD and HSP forms) for this floor stain to the project engineer, Code 106.4 PCBs, Building 521, second floor.

5.3 Sampling Evolution (Place an x or number on applicable line)

	eptance	Review and Approval and Resampling Results
6.1		w and approval of information package. Floor oil stain as with requirements of this TWD.
	Code 106.4	Date
6.2	Code 106.4 review and ac satisfactory they must be other samples where no r	cceptance of resampling results. For results to be ≤ 10 µg/100 sq. cm. for wipe samples and < 50 ppm for elease to the environment has occurred. ☐ UNSAT (remarks required)
	Code 106.4	Data
	Code 100.4	Date
7.0	Enclosures (1) Sample Results	

- (2) Health And Safety Plan Acceptance Form (3) Sketch





ANALYTICAL REPORT

Date Sampled	04/17/95
Date Received.	04725795
Date Extracted:	04/28/95
Date Analyzed.	05/05/95
Work Order No :	95-04-517
Method: EPA	4 8080 (PCBs)
Page 1 of 6	
	Date Received. Date Extracted: Date Analyzed. Work Order No.: Method: EP/

All results are reported in agrisample.

Sample Number: :5978-95 (688/05-F2/misc & oit stain #)

<u> Analyte</u>	Concentration	Repaitable Ligit
Arocia - 1016	MO Section 1	0.1
Aroclor-1221	MD	0,1
Aroclor-1232	ИÙ	0.1
Aroclor-1242	NO	Ű 1
Areclor-1248	ND -	0.1
Aroclor-1254	4.09	0.4
Aroclor-1260	ND	0.1
Aroclor-1262	СИ	1.0
Sample Number:	5979-95 (688/05-F2/misc & oil stain #∫\$\(\sigma\)\$=	0663]
Aroclor-1016	ND	0.3
Arodor-1221	ND	0,1
Aroclor-1232	ND	0.1
Aroclor-1242	CIM	0.1
Arcelor-1248	ND	0.1
Aroclor-1254	15.1	0.17
Aroclor-1260	ND	0.1
Araclor-1262	NO	0.1

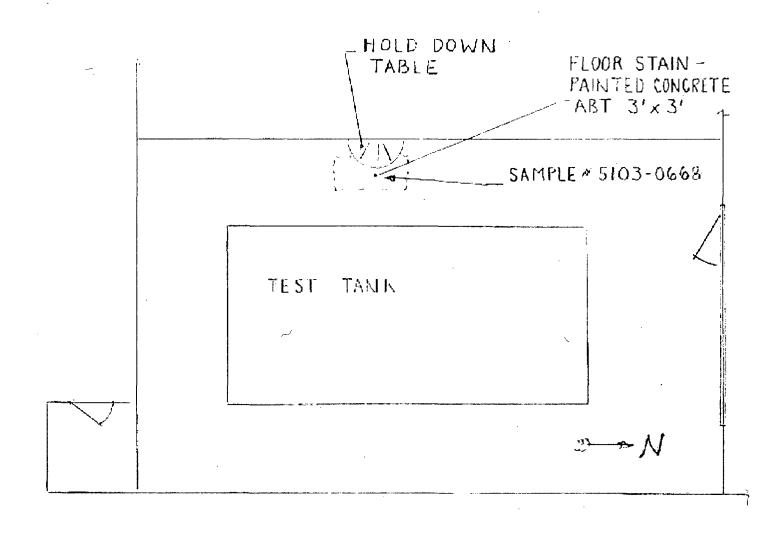
Enclosure 1

Health And Safety Plan Acceptance Form

at the PCB work	area. Attach the completes forms to the TVVD.
TWD No.:	95-0340
PCBCM#: _	FLOOR STAIN -88
By my signature	below, I acknowledge that I have read and understand the contents of
the Health & Sal	fety Plan for this project. I agree to perform my work in accordance
with the Health a	and Safety Plan.
Signature	e
	. (
Print Nar	ne ,
Code	
	·
Date	
~	
By my signature	below, I acknowledge that I have read and understand the contents of
the Health & Sa	fety Plan for this project. I agree to perform my work in accordance
with the Health	and Safety Plan.
Signatur	e .
Print Nai	me ,
Code	
Date	

INSTRUCTIONS: This form is to be completed by each person prior to beginning work

Enclosure 2



PLAN VIEW

BLDG. 688-SOUTH EAST CORNER OF BUILDING

SKETCH- FLOOR STAIN BLDG. 688

ENCLOSURE 3 TWD 95-0340

MARE ISLAND NAVAL SHIPYARD YARD ROUTE SLIP

106.4PC	.B	MAHE	L. RAMEY		6-7657	DATE / STYLE
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ANALYTICAL REPORT

Mare Island Naval Shipyard	Date Sampled:	04/17/95
Code 100,14, Stop 1/56	Date Renewest	04/25/95
Building 1345	Date Extracted:	04/28/95
Vallejo, CA 94592-5100	Date Analyzed:	06/05/95
•	Work Onlea No.:	95-04-517
Attn; Tanımı Kratzet	Method E	PA 8080 (PCBs)
RE: Contract No. N90123-92-D-4011	Page 1 of 6	,

All results are reported in pg/sample.

Sample Number: 5978-95 (688/05-F2/misc & oil stain #)

		Reportable
<u>Analyle</u>	Concentration	Ljimit
Arodior-1016	ND.	G . 1
Arador-1221	ND	0.1
Arodor-1232	ND	0.1
Arador-1242	ND	0.1
Arodor-1248	.ND	9.1
Aroclor-1254	4.09	u.1 **
Aroclor-1260	ND	0.1
Araclor-1/262	ПD	0.1
Sample Number: 5979-	95 (688/05-F2/misc & oil stain #) <i>[≲≀</i>	05-0669]
Aractor-1016	ND	0.3
Aroclor-1221	ND	0.1
Arodlor-1232	ND	0.1
Arodior-1242	ÜN	0.1
Aroclor-1248	NĎ.	0.1
Atoclar-1254	15.1	0.1
Aroclor-1260	ND	0.1
Aroclor-1262	ND	0.1

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95-m.0905

Doc Num 51070435 Page 1 of 2

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From Tammi Kratzet HIRSY Code 106.14 Stop 756 Bldg 1345 Valtejo, CA 94592-5100 Tel (707) 646-0181 Fax (707) 646-0184 To Dal Science Environmental Laboratories, Inc. 11601 Seaboard Circle Syanton CA 90686 Ael (714) 895-5494 Fax (714) 894-7501

INSTRUCTION BLOCK

Turnaround Time:

unitten GC Report Required?

[] Same Day [] 24 Hes | | 48 Hes | [] 5 Days [8] 10 Coys | [] Rush

[X] Routine SC (! RWOCE

PCB SAMPLE DATA BLOCK

C105.14 Sample Mumber	c106.4 Sample 10	Location/Parcel/Sescription	Shinot: Date	eg Tabe		Water Grab	Setid/Soit Filter	Туре	Nun Cont	Comt Size	Amalysis Reduired	
5978-95	5103-0667	688/05-F2/mise & oil stain #	04/17/95	8:05	<u>:</u> :	1 1	(3)	131	171	; 40~l]	I SHOW THE PARTY OF THE PARTY O	
i .		688/05-F2/misc 3 par stain #	04/37/9 5	8:15	()	()	(x)	121	£11	\$ 475K\$	1004	
5980-95	5103-0669	688/09-F2/misc & ail stain #	64/37/95	8:30	()	[]	(X)	(2)	(1)	[40mm]	135:40	
		688/05-F2/misc & oil stain #	04/17/95	8:45	4X1	1.1	1 1	(51	[11	(40-I)	3000	
		688/05-F2/misc & ail stain #	04/17/95	9:00	1 1	tr	1X1	151	(1:	(4551)	<u> </u>	
		688/05-72/misc 3 out state #	04/37/95	9:15	1 1	(1	[X]	120	:1:	1. 40mth	3	
		688/05-F2/mise & ois sturn #	04/*7/95	9:39	1.1	1 1	fag	(2)	(1)	[40 847	I the	
		688/05-FZ/nisc & ail stain # QANK	04/17/99	9:45	()	: i	·y1	7:30	:11	1 40±11	1020 K	
5986.93	5103-0676	685/05-F2/mise oil stain #	04/17/95	10:00	: 1	1:	1X1	(2)	[,]	६ ४८च्याः	<u> </u>	
5987-95	\$103-0577	688/05-F2/misc til stain #	54/17/95	10:15	: 1	ti	:x:	:2:	[1]	\$ 405.}	<u>1895-18</u>	
		[2] swipe spitt, [3] swipe/dexv int [4] so	sind sprijt,	[5] oi!	res	ma, (6)	water graq,	(7) ox	g - V			

CHAIN OF CUSTODY RECORD

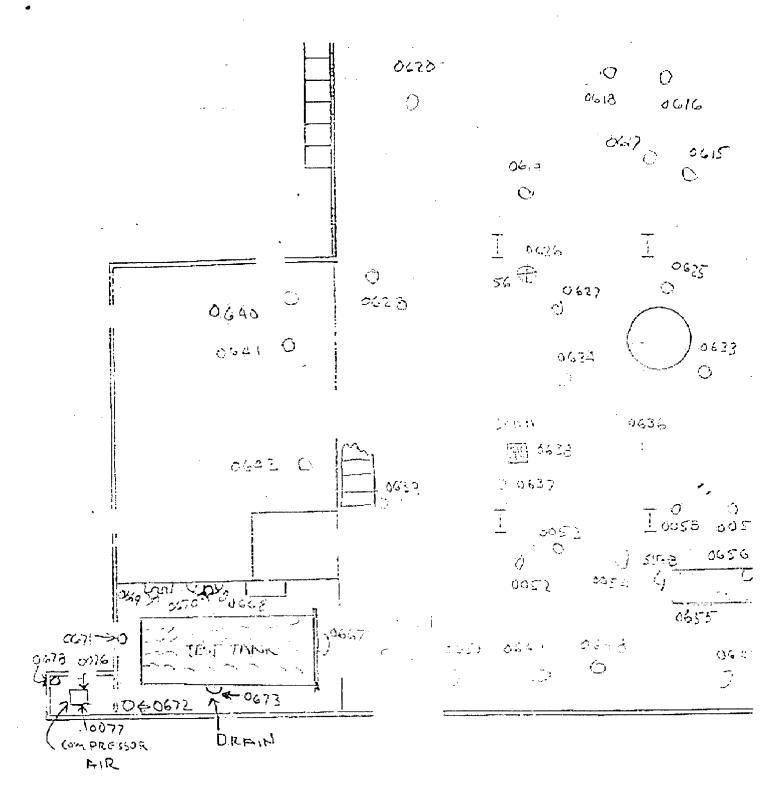
Data Transferred by: (Signature)		23:05/1/95	
Relinquished by: (Signature)	Received by: (Signature) 4	9/12/15	17/600
	-Received by: (Signature)	4/19/25.	1000
Relinquished by: (Signature)	Received by: (Signature).	Date:	Semmo
Relinquished by: (Signature)	Received for Laboratorys (Signature)	Date:	Nac:

PCB SURVEY AND SAMPLE DATA SHEET (ADDOM SHEET)

Blog Dag - Min	e fred		High O. ast		·			
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Property Municer		**************************************	0ी :वेश्वः	0000 and a to \$0.000		MIDE GÉ S		
TE SAMPLE DATA H	LOCK.	A						
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	5103-0668	4-17-35	<u> *1:55</u>	() E1	141	121	[·/.]	e de la companya del companya de la companya de la companya del companya de la co
•	5:03-0569	447815	V, ,	, (1 1,1	(H	1 1/2 1	i /:	March Birth Collections
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	5103-0671	(1-17-7);)	:1 13	1.2	[A.,]	14.41	Kar of Car Hard Salvey
	9103-0672	4-11-17		() ()	<i>(ia</i>)	, , <u>,</u>	(4 + 1	* 15 000 000 000 000 000 000 000 000 000
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Samples were taken, labeled, sealed, recorded, stored and secured from tampering by unauthorized personnel as required by: Section 3 of "Work Plan PCB Survey and Sampling For Possible Spill Sites":

Hanse Development	Bodge Nun FBr (0	Date <u>2/2/2-7</u> {
Home Pour Carlot	Badge Num <u>(732 tr.c)</u>	4
home The Trans	Badge Num 32571	Date



FACILITY AND PRODUCTION EQUIPMENT FIRST FLOOR

5103 SERIES SAMPLE 封's